REMARKS

Claims 1-20 are pending in the application. Claims 1 and 2 were rejected and claims 3-7 were objected to. Claims 8-20 are allowed. In view of the following remarks, reconsideration of the application is respectfully requested.

Addressing of Papers

As a preliminary matter, since receipt of the January 12, 2005 Office Action, Applicant has revoked the prior power of attorney and submitted a new power of attorney. Applicant mentions this to alert the Examiner to the new mailing address and telephone number for Mr. Harris. Please direct future correspondence to the new mailing address shown at the end of this paper, and if possible use the new docket number indicated on this response.

Claim Rejections – 35 U.S.C. § 103

Claims 1 and 2 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Francis et al., U.S. Patent No. 6,580,720 ("Francis"), in view of Zheng et al., U.S. Patent No. 6,804,255 ("Zheng"). Applicant respectfully traverses this rejection and submits that the combination of Francis and Zheng fail to create a *prima facie* case of obviousness for claims 1 and 2.

To create a *prima facie* case of obviousness for a rejected claim, the combination of references must, among other things, teach or suggest each element of the claim. Claim 1 recites, in part, "a single electrical backplane rated to distribute at least 5000 Watts of power from a power supply to modules connected to the backplane." Applicant respectfully submits that this element is not taught or suggested by the references.

The rejection asserts that:

> Francis teaches a modular router comprising a single electrical backplane rated to distribute at least 5000 Watts of power from a power supply to modules connected to the back plane (see figure 15A, Hub Rack 2 and column 27 lines 1-27, wherein Hub Rack 2 is interpreted as a single back plane receiving power from AC power 214 (column 24 lines 43-44), the Hub Rack distributed output power to plurality of PI racks 1 that is connecting to the Hub rack 2 as discloses in figure 15A. Further each PI rack 1 consumed at least 1250 Watts (column 22 lines 20-24). Further, Figure 15A discloses 8 PI rack 1 is electrically connecting to the Hub Rack 2 via the Electrical line and therefore, 8 times 1250 Watts is greater than 5000 Watts). (January 12, 2005 Office Action at 2-3.)

Applicant respectfully traverses this interpretation of Francis as not supported by the reference. First, Hub Rack 2 is a convention rack of separately mounted equipment, connected by cables, not a single electrical backplane. Figures 24A and 24B illustrate that the Hub Rack comprises no less than eight separate components mounted to a rack rail 22, connected by cables. Hub controller cage 23 has its own backplane 235 (Figure 25) and time-sampled bridge 25 has its own backplane 253 (Figure 27). Thus the Hub Rack may have components with electrical backplanes, but the Hub Rack has no single backplane.

Second, it is clear that Francis' Hub Rack does not distribute power to the PI racks. Like the Hub Rack, the PI rack is a large electrical rack with eight separate rack-mounted modules (see Figures 16A and 16B). Three of these PI rack modules deliver power to the PI rack—in fact the column 22 reference pointed to in the rejection specifically states that the PI rack power modules deliver power to the PI rack.

Finally, the electrical connections shown between the Hub Rack and PI racks in Figure 15A are not power connections, and are certainly not power connections distributed through a backplane. Based on the teaching that each rack has its own power supplies, there is no need for such connections. Further, the text accompanying Figure 15A describes the inter-rack connections as "Electrical MIPPSS Interconnections," (col. 15, l. 62), referring to the switching connections of the switching system. This is further supported by the detailed configurations described by Francis (see, e.g., Figure 45, which shows the electrical signal 31 between two racks as a TTL level signal).

Given these teachings, Applicant respectfully disagrees that Francis' Hub Rack comprises a single electrical backplane rated to distribute at least 5000 Watts of power from a power supply to modules connected to the backplane. Zheng does not appear to teach anything that overcomes these deficiencies.

The rejection further states asserts "the backplane further comprising multiple high speed serial differential signaling trace pairs for carrying packet data signaling between modules connected to the back plane (see figures 15A, Fiber optic cables are connecting to the Hub rack 2 for data transferring)." (January 12, 2005 Office Action at 3.)

As a first matter, Applicant has electronically searched both lengthy references—neither even contains the word differential, and neither mentions high speed serial differential signaling trace pairs. Francis does extensively discuss TTL and ECL signaling, neither of which uses differential signaling trace pairs.

Second, a fiber optic cable is neither electrical, differential, nor a backplane. It is respectfully not understood how data transfer between modules over a single optical cable

using light modulation applies to the claimed data signaling across an electrical backplane using differential signaling pairs.

Considered together, the references fail to teach or suggest what is claimed. Clearly Francis' modules are in separate electrical racks and do not share a common backplane. Each of Francis' racks has its own power supplies. Neither reference discloses high-speed serial differential signaling, or the claimed distributed power rating for a single backplane. Applicant respectfully submits that the combination of Francis and Zheng fails to disclose all elements of either rejected claim, and therefore fails to create a *prima facie* case of obviousness at least for the stated reasons. Applicant respectfully requests that this rejection be withdrawn and that the application be allowed to proceed to issuance.

Allowable Subject Matter

Claims 3-7 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In view of the arguments above for the allowability of the claims from which claims 3-7 depend, Applicant has elected to not rewrite claims 3-7 at the present time.

Conclusion

For the foregoing reasons, Applicant respectfully requests allowance of claims 1-20 as presently constituted. The Examiner is encouraged to telephone the undersigned at 512.867.8502 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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Date: 4/12/05

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner For Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date indicated below:

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